

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Numbering Resource Optimization	)	CC Docket 99-200
	)	

**COMMENTS OF  
FOCAL COMMUNICATIONS CORPORATION**

Focal Communications Corporation (“Focal”) submits these comments in response to the Common Carrier Bureau’s request regarding the proposed national thousands-block number pooling rollout schedule.<sup>1</sup> Focal is a facilities-based competitive local exchange carrier (“CLEC”) offering a range of solutions, including local phone and data services, to large communications-intensive customers in major markets nationwide.

Focal supports the proposed number-pooling schedule as reasonable for carriers to implement, and necessary to minimize the problems of number shortage and area code exhaust. As the Commission had previously determined, “thousands-block number pooling is a valuable mechanism to remedy the inefficient allocation and use of our numbering resources.”<sup>2</sup> Moreover, availability of numbering resources is vital to the further development of competition. To effectively compete, CLECs such as Focal must be able to obtain access to numbering resources in all NPAs in which they provide service.

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<sup>1</sup> *The Common Carrier Bureau Seeks Comment on the National Thousands-Block Number Pooling Rollout Schedule*, CC Docket 99-200 (rel. Oct. 17, 2001).

<sup>2</sup> *Numbering Resource Optimization*, Report and Order and Further Notice of Proposed Rulemaking, CC Docket No. 99-200, ¶ 122 (rel. March 31, 2000).

As the Bureau is aware, number pooling has already been adopted and proven successful in states such as New York and Illinois. These experiences with number pooling have demonstrated that it is a valuable tool in extending the life of NPAs and maximizing the efficient distribution of numbering resources. Therefore, the Bureau should adopt NeuStar's proposed schedule as necessary to prevent further area code exhaust. Focal agrees that the NPAs NeuStar identified to transition during the first several quarters are the ones that are most vulnerable to exhaust. Thus, Focal supports the schedule that NeuStar developed and believes that the proposed schedule represents the correct order of priority.

Moreover, Focal believes that the proposed schedule is reasonable for carriers to implement in the required time periods. The effort involved for carriers to comply with the proposed schedule is insignificant in comparison to the harm both carriers and consumers would be required to endure should the schedule be delayed. In short, the Bureau should adopt NeuStar's schedule for number pooling, and ensure that all carriers required to participate in number pooling adhere to the proposed schedule.

Respectfully submitted,

/s/

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